

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

DAVID D. HENWOOD, :
 :
 Plaintiff, :
 :
 v. : Civil Action No.
 : 3:01 CV 996 (AWT)(DFM)
 :
 UNISOURCE WORLDWIDE, INC. and :
 GEORGIA-PACIFIC CORP. :
 :
 Defendants. : July 1, 2004

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

____ Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, the Plaintiff David Henwood moves for leave to amend his complaint for the sole purpose of adding Paragraph 63 to the Seventh Count, and he therefore requests that the Court accept for filing the attached Amended Complaint. The Plaintiff seeks to amend the operative complaint, dated January 21, 2004, in order to avoid the senseless adjudication of the Defendants' technical argument that his promissory estoppel claim is defective because of his failure to plead explicitly the legal conclusion that "injustice can be avoided only by enforcement of the defendants' promises." Rule 15(a) mandates that leave to amend "shall be freely given when justice so requires," and the Plaintiff respectfully submits that the Defendants will suffer no prejudice from this technical amendment to the Plaintiff's complaint.

ORAL ARGUMENT IS NOT REQUESTED

Therefore, the Plaintiff respectfully requests that the Court accept for filing the attached Amended Complaint.

RESPECTFULLY SUBMITTED,
THE PLAINTIFF DAVID D. HENWOOD

By _____/s/_____
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was sent by U.S. Mail, postage prepaid, to the following counsel of record on this 1st day of July 2004:

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/s/
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